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February 27, 2015

Judge Paul A. Crotty, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Chambers 1350
New York, NY 10007

Re: *Donoghue v. Achillion Pharmaceuticals, Inc.*, No. 1:14-cv-8353-PAC (S.D.N.Y.)

Dear Judge Crotty,

I write on behalf of all defendants in the above-captioned matter, and in accordance with Local Civil Rule 7.1(d) and the Court's Individual Rule 1(E), to request an extension of time to answer or otherwise respond to the complaints in the above captioned matter.¹

The date on which defendants are currently due to answer or otherwise respond is March 17, 2015.

On February 18, 2015, counsel for all Parties met for several hours to discuss their respective clients' views on the claims at issue. At the conclusion of that meeting, all counsel agreed to continue to pursue a resolution of this matter outside of litigation. In furtherance of that goal, Defendants have already begun to produce documents, well

¹ Per the Court's January 21, 2015, Order (Dkt. 22), this action has been consolidated with *Roth v. RA Capital Management, LLC*, No. 1:14-cv-8594-PAC (S.D.N.Y.). Plaintiffs have not, as of the date of this letter, consolidated their respective complaints.

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ahead of the schedule set forth in the Court's February, 25, 2015, Civil Case Management Plan and Scheduling Order (Dkt. 26).

Counsel for all defendants have conferred and, in order to promote efficiency in the conduct of this action, seek to bring a joint motion for an extension of time to answer or otherwise respond to the complaints until April 16, 2015, which is 30 days after the current deadline. This is defendants' third request for an extension of time. The Court granted defendants' previous requests.

Defendants have conferred with counsel for plaintiffs and confirmed that plaintiffs consent to defendants' joint motion.

Respectfully submitted,

By: /s/ Derek Musa
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cc: David Lopez, Esq.
Glenn Ostrager, Esq.
Paul Wexler, Esq.

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of February 2015, I served the foregoing document upon all registered counsel in the case via the Court's CM/ECF system by filing the document electronically with the Clerk of Court.

New York, New York

/s/ Derek Musa
Derek Musa